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March 18, 2025

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 03/19/2025

Separately, I will file
the redacted version of
Opinion & Order on the
public docket.

**Re: *International Flight Resources, LLC v. Aufiero*,
Case No.: 1:21-cv-03029-VSB
Joint Sealing Request**

Dear Judge Broderick:

The undersigned counsel represents Plaintiff International Flight Resources, LLC (“IFR”) and Defendants Wells Fargo & Co. and Wells Fargo Merchant Services, LLC (collectively, “Wells Fargo,” and together with IFR, the “Parties”) in the above-captioned action (the “Action”). In accordance with this Court’s directive, as set forth in its March 4, 2024 Order of Dismissal (the “Opinion and Order”), the Parties have met and conferred on proposed redactions to the Opinion and Order and have agreed-upon redaction proposals submitted herewith (the “Redaction Proposals”). *See Exhibit A.*

Consistent with prior sealing requests, the Redaction Proposals are narrowly tailored to cover highly sensitive and confidential information, including the terms of the Settlement Agreement subject to a confidentiality provision and non-public business information relating to the Parties’ settlement negotiation strategy. This Court has previously granted Wells Fargo’s requests to seal identical information contained in the briefing underlying the Opinion and Order. *See ECF Nos. 37, 47, 76 and 84.* As such, the parties are hereby requesting that this same information be redacted in the Opinion and Order.

We appreciate your attention to this matter.

Respectfully submitted,

/s/ Katherine A. Garland
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*Counsel for Defendants Wells Fargo & Co. and Wells
Fargo Merchant Services, LLC*

/s/ Jean-Marc Zimmerman

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